

**FILED**

APR 21 2022

U.S. DISTRICT COURT  
EVANSVILLE, INDIANA

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

QUINTEZ TUCKER,  
D'MAURAH BRYANT, and  
ROBDARIUS WILLIAMS,

Defendants.

CAUSE NO. 1:22-cr-63-JMS-mg

-01

-02

-03

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

Conspiracy to Commit Interference with Commerce by Robbery  
18 U.S.C. § 1951(a)

1. Beginning on or about November 8, 2021, and continuing through and including on or about December 3, 2021, in the Southern District of Indiana, QUINTEZ TUCKER, D'MAURAH BRYANT, and ROBDARIUS WILLIAMS, defendants herein, together with others known and unknown to the Grand Jury, did knowingly and intentionally conspire, combine, confederate, and agree to commit certain offenses against the United States, that is, obstructing, delaying, or affecting commerce by robbery, all in violation of Title 18, United States Code, Section 1951(a).

**Purpose of the Conspiracy**

2. It was the purpose of the conspiracy to unlawfully enrich the defendants by robbing various retail outlets of cellular telephones and cellular telephone accessories for resale; as well as stealing United States currency.

Manner and Means of the Conspiracy

3. Among the manner and means by which the defendants would and did carry out this conspiracy were the following:

a. TUCKER, BRYANT, WILLIAMS, and others known and unknown to the Grand Jury, including juveniles, planned and carried out, or attempted to carry out, armed robberies of retail cellular phone stores in and around Indianapolis, Indiana.

b. Upon arrival at the scene of a robbery, some combination of TUCKER, BRYANT, WILLIAMS, and others known and unknown to the Grand Jury, including juveniles, entered the store, brandished firearm(s) by pointing them at store employees and customers, and took cellular phones, accessories, and United States currency.

c. As a result of this conspiracy, the defendants and others, collectively, robbed or attempted to rob at least nine cellular phone retail outlets in the Southern District of Indiana.

Overt Acts

4. In furtherance of the conspiracy and to achieve its object, the defendants committed and caused to be committed, in the Southern District of Indiana, the following overt acts, among others:

a. On or about November 8, 2021, in Fishers, Indiana, TUCKER and BRYANT robbed a Verizon retail store.

b. On or about November 16, 2021, in Indianapolis, Indiana, TUCKER, BRYANT, and Juvenile A robbed an AT&T retail store.

c. On or about November 18, 2021, in Indianapolis, Indiana, TUCKER, BRYANT, and Juvenile A attempted to rob a T-Mobile retail store.

d. On or about November 23, 2021, in Indianapolis, Indiana, TUCKER and BRYANT robbed a Verizon retail store.

e. On or about November 26, 2021, in Indianapolis, Indiana, TUCKER and BRYANT robbed a T-Mobile retail store.

f. On or about November 29, 2021, in Indianapolis, Indiana, TUCKER and BRYANT robbed a T-Mobile retail store.

g. On or about December 1, 2021, in Indianapolis, Indiana, TUCKER and Juvenile B robbed a T-Mobile retail store.

h. On or about December 1, 2021, in Indianapolis, Indiana, TUCKER and Juvenile B robbed a T-Mobile retail store.

i. On or about December 3, 2021, in Indianapolis, Indiana, TUCKER, WILLIAMS, Individual 1, Juvenile B, and Juvenile C robbed an AT&T retail store.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

Interference with Commerce by Robbery  
18 U.S.C. §§ 1951(a) & 2

At all times material to this Indictment, the Verizon store, located at 11760 Olio Road, Fishers, Indiana, was a commercial business that regularly engaged in interstate and foreign commerce.

On or about November 8, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and D'MAURAH BRYANT, defendants herein, together with others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect and/or attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code,

Section 1951, in that the defendants did unlawfully attempt to take and obtain U.S. currency and merchandise from an employee of the Verizon store against the employee's will, by means of actual and threatened force, violence, and fear of injury to said person, and aided and abetted others in so doing, all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

Brandishing of a Firearm  
In Furtherance of a Crime of Violence  
18 U.S.C. §§ 924(c)(1)(A)(ii) & 2

On or about November 8, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and D'MAURAH BRYANT, defendants herein, in furtherance of a crime of violence, to wit: interference with commerce by robbery as charged in Count Two, brandished a firearm, and aided and abetted others in so doing, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT FOUR

Interference with Commerce by Robbery  
18 U.S.C. §§ 1951(a) & 2

At all times material to this Indictment, the AT&T store, located at 4850 Southport Road, Indianapolis, Indiana, was a commercial business that regularly engaged in interstate and foreign commerce.

On or about November 16, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and D'MAURAH BRYANT, defendants herein, together with others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect and/or attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully attempt to take and obtain U.S.

currency and merchandise from an employee of AT&T store against the employee's will, by means of actual and threatened force, violence, and fear of injury to said person, and aided and abetted others in so doing, all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIVE  
Brandishing a Firearm  
In Furtherance of a Crime of Violence  
18 U.S.C. §§ 924(c)(1)(A) (ii) & 2

On or about November 16, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and D'MAURAH BRYANT, defendants herein, in furtherance of a crime of violence, to wit: interference with commerce by robbery as charged in Count Four, brandished a firearm, and aided and abetted others in so doing, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT SIX  
Interference with Commerce by Robbery  
18 U.S.C. §§ 1951(a) & 2

At all times material to this Indictment, the Verizon store, located at 1950 Kessler Boulevard West Drive, Indianapolis, Indiana, was a commercial business that regularly engaged in interstate and foreign commerce.

On or about November 23, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and D'MAURAH BRYANT, defendants herein, together with others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect and/or attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully attempt to take and obtain U.S.

currency and merchandise from an employee of the Verizon store against the employee's will, by means of actual and threatened force, violence, and fear of injury to said person, and aided and abetted others in so doing, all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT SEVEN  
Brandishing of a Firearm  
In Furtherance of a Crime of Violence  
18 U.S.C. §§ 924(c)(1)(A)(ii) & 2

On or about November 23, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and D'MAURAH BRYANT, defendants herein, in furtherance of a crime of violence, to wit: interference with commerce by robbery as charged in Count Six, brandished a firearm, and aided and abetted others in so doing, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT EIGHT  
Interference with Commerce by Robbery  
18 U.S.C. §§ 1951(a) & 2

At all times material to this Indictment, the T-Mobile store, located at 1560 East 86<sup>th</sup> Street, Indianapolis, Indiana, was a commercial business that regularly engaged in interstate and foreign commerce.

On or about November 26, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and D'MAURAH BRYANT, defendants herein, together with others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect and/or attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully attempt to take and obtain U.S. currency and merchandise from an employee of T-Mobile against the employee's will, by means

of actual and threatened force, violence, and fear of injury to said person, and aided and abetted others in so doing, all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT NINE

Brandishing of a Firearm  
In Furtherance of a Crime of Violence  
18 U.S.C. §§ 924(c)(1)(A)(ii) & 2

On or about November 26, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and D'MAURAH BRYANT, defendants herein, in furtherance of a crime of violence, to wit: interference with commerce by robbery as charged in Count Eight, brandished a firearm, and aided and abetted others in so doing, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT TEN

Interference with Commerce by Robbery  
18 U.S.C. §§ 1951(a) & 2

At all times material to this Indictment, the T-Mobile store, located at 11725 Fox Road, Indianapolis, Indiana, was a commercial business that regularly engaged in interstate and foreign commerce.

On or about November 29, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and D'MAURAH BRYANT, defendants herein, together with others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect and/or attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully attempt to take and obtain U.S. currency and merchandise from an employee of the T-Mobile store against the employee's will, by means of actual and threatened force, violence, and fear of injury to said person, and aided

and abetted others in so doing, all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT ELEVEN

Brandishing of a Firearm  
In Furtherance of a Crime of Violence  
18 U.S.C. §§ 924(c)(1)(A)(ii) & 2

On or about November 29, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and D'MAURAH BRYANT, defendants herein, in furtherance of a crime of violence, to wit: interference with commerce by robbery as charged in Count Ten, brandished a firearm, and aided and abetted others in so doing, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT TWELVE

Interference with Commerce by Robbery  
18 U.S.C. §§ 1951(a) & 2

At all times material to this Indictment, the T-Mobile store, located at 1155 East Stop Road, Indianapolis, Indiana, was a commercial business that regularly engaged in interstate and foreign commerce.

On or about December 1, 2021, in the Southern District of Indiana, QUINTEZ TUCKER the defendant herein, together with others known and unknown to the Grand Jury did unlawfully obstruct, delay, and affect and/or attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully attempt to take and obtain U.S. currency and merchandise from an employee of the T-Mobile store against the employee's will, by means of actual and threatened



force, violence, and fear of injury to said person, and aided and abetted others in so doing, all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THIRTEEN  
Brandishing of a Firearm  
In Furtherance of a Crime of Violence  
18 U.S.C. §§ 924(c)(1)(A)(ii) & 2

On or about December 1, 2021, in the Southern District of Indiana, QUINTEZ TUCKER, the defendant herein, in furtherance of a crime of violence, to wit: interference with commerce by robbery as charged in Count Twelve, brandished a firearm, and aided and abetted others in so doing, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT FOURTEEN  
Interference with Commerce by Robbery  
18 U.S.C. §§ 1951(a) & 2

At all times material to this Indictment, the T-Mobile store, located at 6929 West 38<sup>th</sup> Street, Indianapolis, Indiana, was a commercial business that regularly engaged in interstate and foreign commerce.

On or about December 1, 2021, in the Southern District of Indiana, QUINTEZ TUCKER, the defendant herein, together with others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect and/or attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully attempt to take and obtain U.S. currency and merchandise from an employee of the T-Mobile store against the employee's will, by means of actual and threatened force, violence, and fear of injury to said person, and aided and abetted others in so doing, all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIFTEEN

Brandishing of a Firearm  
In Furtherance of a Crime of Violence  
18 U.S.C. §§ 924(c)(1)(A)(ii) & 2

On or about December 1, 2021, in Marion County Indiana, within the Southern District of Indiana, QUINTEZ TUCKER, the defendant herein, in furtherance of a crime of violence, to wit: interference with commerce by robbery as charged in Count Fourteen, brandished a firearm, and aided and abetted others in so doing, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT SIXTEEN

Interference with Commerce by Robbery  
18 U.S.C. §§ 1951(a) & 2

At all times material to this Indictment, the AT&T store, located at 8855 South Emerson Avenue, Indianapolis, Indiana, was a commercial business that regularly engaged in interstate and foreign commerce.

On or about December 3, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and ROBDARIUS WILLIAMS, defendants herein, together with others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect and/or attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully attempt to take and obtain U.S. currency and merchandise from an employee of the AT&T store against the employee's will, by means of actual and threatened force, violence, and fear of injury to said person, and aided and abetted others in so doing, all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT SEVENTEEN  
Brandishing of a Firearm  
In Furtherance of a Crime of Violence  
18 U.S.C. §§ 924(c)(1)(A)(ii) & 2

On or about December 3, 2021, in the Southern District of Indiana, QUINTEZ TUCKER and ROBDARIUS WILLIAMS, defendants herein, in furtherance of a crime of violence, to wit: interference with commerce by robbery as charged in Count Sixteen, brandished a firearm, and aided and abetted others in so doing, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

**FORFEITURE**

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1951, set forth in Counts 1, 2, 4, 6, 8, 10, 12, 14 and 16 of this Indictment, QUINTEZ TUCKER, D'MAURAH BRYANT and ROBDARIUS WILLIAMS, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to:

- A. United States currency in the amount of \$411;
- B. and a sum of money equal to the proceeds derived from the offense

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 924 set forth in Counts 3, 5, 7, 9, 11, 13, 15 and 17 of this Indictment, QUINTEZ TUCKER, D'MAURAH BRYANT and ROBDARIUS WILLIAMS, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- A. One rifle Mossberg 715T, bearing serial number EMC3686376
- B. All seized ammunition

3. If any of the property described above, as a result of any act or omission of the defendants:

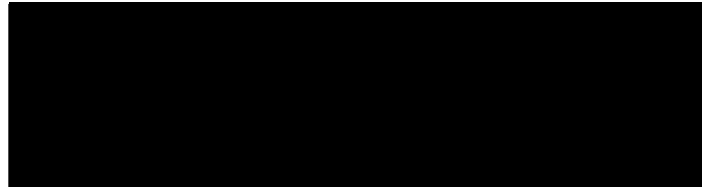
- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third party;
- C. has been placed beyond the jurisdiction of the court;

D. has been substantially diminished in value; or

E. has been commingled with other property, which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).


All pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c).

A TRUE BILL:



ZACHARY A. MYERS  
United States Attorney

By:

  
\_\_\_\_\_  
Lawrence D. Hilton  
Assistant United States Attorney